

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

**RODERICK SANDERS
ON BEHALF OF HIMSELF AND A
CLASS OF SIMILARLY SITUATED
LOUISIANA RESIDENTS**

CIVIL ACTION NO. _____

VERSUS

JUDGE _____

CITY OF WINNFIELD

MAGISTRATE JUDGE _____

NOTICE OF REMOVAL

NOW INTO COURT, through undersigned counsel, comes defendant, City of Winnfield, (“Winnfield”) and, appearing solely for the purpose of presenting this Notice of Removal of the above entitled cause to this Honorable Court under the provisions of 28 U.S.C. § 1441 (b), et seq., and reserving all rights, respectfully shows as follows:

1.

This suit was commenced in the Eighth Judicial District Court, Winn Parish, Louisiana, by Roderick Sanders, allegedly on behalf of himself and a Class of Similarly Situated Louisiana Residents, on the 5th day of June, 2017, docket number 45,347. Winnfield therefore files this Notice of Removal within thirty (30) days from service of the Petition. Winnfield was served with the Petition on June 15, 2017.

2.

This action is of a civil nature at law. The plaintiff seeks recovery under state and federal law, including the Equal Protection Clause of the United States Constitution, 42 U.S.C. § 1981, and 42 U.S.C. § 1983.

3.

This Court has jurisdiction of this cause of action under 28 U.S.C. §1331, federal question jurisdiction.

4.

The proper court for removal is the United States District Court for the Western District of Louisiana.

5.

The parties that have been served at the time of removal and their counsel are as follows:

Defendant, City of Winnfield, by Donald Armand, Jr. Edwin H. Byrd, III, and Zachary Wilkes of the firm Pettiette, Armand, Dunkelman, Woodley, Byrd & Cromwell, 400 Texas Street, Suite 400, P.O. Box 1786, Shreveport, Louisiana 71166-1786.

6.

Defendant files herewith a copy of all papers they have received and all documents contained in the suit record consisting of:

- (1) June 5, 2017 Petition for Damages and Class Action and Request for Notice with Citation to City of Winnfield, served personally on June 15, 2017.

7.

Defendant further shows unto the Court that immediately upon the filing of this Notice of Removal a copy of same shall be served upon all adverse parties and a copy filed with the Clerk of the Eighth Judicial District Court, Winn Parish, Louisiana, all in accordance with 28 U.S.C. § 1446(d).

8.

Defendant further shows that if any funds are held by the State Court which are properly transferable to this Court, a request for the transfer of those funds will be made.

PETTIETTE, ARMAND, DUNKELMAN,
WOODLEY, BYRD & CROMWELL, L.L.P.

S//Donald Armand, Jr.

Donald Armand, Jr. #17444
Edwin H. Byrd, III #19509
Zachary A. Wilkes #36730

400 Texas Street, Suite 400 (71101)
Post Office Box 1786
Shreveport, Louisiana 71166-1786
Ph. (318) 221-1800 Fax (318) 226-0390

ATTORNEYS FOR DEFENDANT,
THE CITY OF WINNFIELD

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Notice of Removal has this date been served upon the following by placing same in the United States mail, postage prepaid and properly addressed:

Mr. Myrt T. Hales, Jr.
Mr. Joshua L. Strickland
P.O. Drawer 149
Rayville, LA 71269

Honorable Chesney C. Baxley
Clerk of Court
Eighth Judicial District Court
119 W. Aman Street
Winnfield, LA 71483

Shreveport, Louisiana this the 11th day of July, 2017.

S//DONALD ARMAND, JR.
OF COUNSEL

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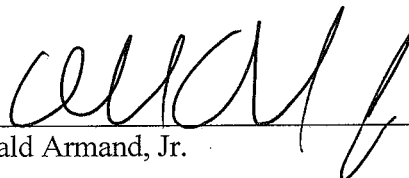
AFFIDAVIT

STATE OF LOUISIANA :

PARISH OF CADDO :

BEFORE ME, the undersigned Notary Public, personally came and appeared Donald Armand, Jr., who after being duly sworn, did depose and state:

He is the attorney for defendant, The City of Winnfield, in the above and foregoing Notice of Removal, and that the copies of the documents listed in paragraph 6 of the Notice of Removal constitute the entire state court records as of the date of removal, and all of the allegations of fact contained in the Notice of Removal are true and correct to the best of his knowledge, information and belief.



Donald Armand, Jr.

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public, on this
the 11th day of July, 2017.



NOTARY PUBLIC

JUANICE D. BASS, NOTARY PUBLIC
NOTARY NUMBER 59357
CADDO PARISH, LOUISIANA
MY COMMISSION IS FOR LIFE